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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE COLLEGE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

**REPLY IN SUPPORT OF PLAINTIFFS’
 RENEWED MOTION FOR A
 PROSPECTIVE ORDER CONCERNING
 THIRD-PARTY CLAIMS BUYOUT
 SERVICES**

Hrg. Date: N/A
 Time: N/A
 Judge: Hon. Claudia Wilken
 Courtroom: N/A

Class Counsel has met and conferred with counsel for each of the third parties who filed responses to Plaintiffs' Renewed Motion for Prospective Order Concerning Third-Party Claims Buyout Services. *See* ECF Nos. 1036, 1037, 1039. Based on those discussions, Class Counsel and the third parties agreed to make certain amendments to further clarify the indemnity language that Class Counsel initially proposed in their renewed motion. Counsel for Olanca Holdings LLC was the last to file their response to Plaintiffs' motion. *See* ECF No. 1039. Thus, the indemnity language outlined in their response is a combined proposal that also incorporates proposed changes from class members, Sedee Keita and Eric Ayala. *See* ECF No. 1037. Accordingly, Class Counsel respectfully submit that the Court should order that indemnity language, which is included as part of the attached Amended Proposed Order.¹ For the Court's convenience, Class Counsel submits herewith a new Amended Proposed Order, which includes the same requests as previously, with the new language for the indemnity provision as the only changes.

DATED: September 16, 2025

Respectfully submitted,

By /s/ Steve W. Berman

By /s/ Jeffrey L. Kessler

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¹ Class Counsel included a clean version of this language in the Amended Proposed Order, but the Court can also view a redline version at ECF No. 1039.

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ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

Pursuant to Civil Local Rule 5-1(i)(3), the filer of this document attests that concurrence in the filing of this document has been obtained from the signatories above.

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